

1 **JEFFREY R. ALBREGTS, ESQ.**

2 Nevada Bar No. 0066

3 701 Shadow Lane, Suite 150

4 Las Vegas, Nevada 89106

5 Tele.: 702/483-5026; Fax.: 702/485-2343

6 Email: jalbregts@albregtslaw.com

7 *Attorneys for TPP Alan and Theresa Lahrs*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 THE BANK OF NEW YORK MELLON FKA
11 THE BANK OF NEW YORK, AS TRUSTEE
12 FOR THE CERTIFICATEHOLDERS OF
13 CWALT, INC., ALTERNATIVE LOAN
14 TRUST 2005-56, MORTGAGE
15 PASSTHROUGH
16 CERTIFICATES, SERIES 2005-56,

17 Plaintiff,

18 vs.

19 CHRISTOPHER COMMUNITIES AT
20 SOUTHERN HIGHLANDS GOLF CLUB
21 HOMEOWNERS ASSOCIATION;
22 KUPPERLIN LAW GROUP, LLC; FIRST 100,
23 LLC; ALAN LAHRS AND THERESA LAHRS
24 AS TRUSTEES OF THE LAHRS FAMILY
25 TRUST; DOE INDIVIDUALS I-X, inclusive;
26 and ROE CORPORATIONS I-X, inclusive,

27 Defendants.

28 -----
29 CHRISTOPHER COMMUNITIES AT
30 SOUTHERN HIGHLANDS GOLF CLUB HOA,

31 Cross-Claimant,

32 v.

33 KUPPERLIN LAWGROUP, LLC,

34 Cross-Defendant.

CASE NO. 2:17-cv-01033-JCM-EJY

**THIRD STIPULATION AND
PROPOSED ORDER EXTENDING
THIRD-PARTY PLAINTIFFS
LAHRS' TIME TO FILE REPLY TO
THIRD PARTY DEFENDANTS
COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S AND
LAWYERS TITLE OF NEVADA,
INC'S FIRST AMENDED ANSWER
AND COUNTERCLAIM [ECF 146]**

1 CHRISTOPHER COMMUNITIES AT
2 SOUTHERN HIGHLANDS GOLF CLUB HOA

3 Cross-Claimant,
4 vs.

5 KUPPERLIN LAW GROUP, LLC,
6 Cross-Defendant.

7 KUPPERLIN LAW GROUP, LLC,

8 Counter-Claimant,
9 vs.

10 NATALIE L. WINSLOW, an individual,
11 Counter-Defendant.

12 ALAN LAHRS AND THERESA LAHRS
13 AS TRUSTEES OF THE LAHRS FAMILY
14 TRUST, a trust established under the laws of the
15 State of Nevada,

16 Cross-Claimant,
17 vs.

18 CHRISTOPHER COMMUNITIES AT
19 SOUTHERN HIGHLANDS GOLF CLUB
20 HOA, a homeowner's association governed by
21 the laws of the State of Nevada; KUPPERLIN
22 LAW GROUP, LLC, a Nevada limited liability
23 company; FIRST 100, LLC, a Nevada limited
24 liability company,

25 Cross-Defendants.

26 ALAN LAHRS AND THERESA LAHRS
27 AS TRUSTEES OF THE LAHRS FAMILY
28 TRUST, a trust established under the laws of the
State of Nevada,

Third-Party Plaintiff,

1
2 vs.

3 JAY BLOOM, an individual, DOE
4 INDIVIDUALS I-X, inclusive;
5 and ROE CORPORATIONS I-X, inclusive,

6 Third-Party Defendants.

7 ALAN LAHRS AND THERESA LAHRS,
8 Individually and as TRUSTEES OF THE
9 LAHRS FAMILY TRUST,

10 Third-Party Plaintiffs,

11 vs.

12 COMMONWEALTH LAND TITLE
13 INSURANCE COMPANY, a Foreign
14 Corporation previously registered with the
15 Nevada State Secretary of State's Office;
16 LAWYERS TITLE OF NEVADA, Inc., a
17 Nevada Domestic Corporation; DOE individuals
18 I-V; and ROE CORPORATIONS I-V,

19 Supplemental Third-Party Defendants.

20
21 **THIRD**
22 **STIPULATION AND PROPOSED ORDER EXTENDING THIRD-PARTY**
23 **PLAINTIFFS LAHRS' TIME TO FILE REPLY TO DEFENDANTS**
24 **COMMONWEALTH LAND TITLE INSURANCE COMPANY AND LAWYERS**
25 **TITLE OF NEVADA, INC FIRST AMENDED ANSWER AND COUNTERCLAIM**
26

27 It is hereby Stipulated and Agreed by and between Jeffrey R. Albregts, Esq., counsel
28 for Third-Party Plaintiffs, individually and as Trustees for their Family Trust ("Lahrs"); and
29 Defendants Commonwealth Land Title Insurance Company and Lawyers Title of Nevada, Inc.
30 ("Commonwealth"), by and through their counsel of record, Sophia S. Lau, Esq., and
31 Christopher Ritter, Esq., that Lahrs' deadline to file a Reply to Commonwealth's and Lawyers
32 Title of Nevada, Inc's First Amended Answer and Counterclaim [ECF 146] should be extended
33 from September 2, 2019 to and including **Monday, September 16, 2019.**

1 DATED this 28th day of August, 2019.

2 **JEFFREY R. ALBREGTS, LLC**

3 */s/ Jeffrey R. Albregts*

4 Jeffrey R. Albregts, Esq., NSB 0066
5 JEFFREY R. ALBREGTS, LLC
6 701 Shadow Lane, Suite 150
7 Las Vegas, Nevada 89106
8 Telephone: 702/483-5026
9 Facsimile: 702/485-2343
10 Email: jalbregts@albregtslaw.com
11 *Attorneys for Third Party Plaintiffs Lahrs*

12 DATED this 28th day of August, 2019.

13 **EARLY SULLIVAN WRIGHT**
14 **GIZER & McRAE, LLP**

15 */s/ Christopher I. Ritter*

16 Sophia S. Lau, Esq., NSB 13365
17 8716 Spanish Ridge Avenue, Suite 105
18 Las Vegas, NV 89148
19 Telephone: 702/331-7593
20 Facsimile: 702/331-1652
21 Christopher I. Ritter, Esq.
22 Early Sullivan Wright Gizer & McRae,
23 LLP
24 6420 Wilshire Blvd, 17th Floor
25 Los Angeles, CA 90048
26 *Attorneys for Defendants Commonwealth*
27 *And Lawyers Title of Nevada, Inc.*

28 **IT IS SO ORDERED:**

29 
30 UNITED STATES MAGISTRATE JUDGE

31 Dated: August 29, 2019

CERTIFICATE OF SERVICE

Pursuant to FED. R. CIV. P. 5(b), I certify that on behalf of Jeffrey R. Albregts, LLC, on this ____ day of August, 2019, I caused the above and foregoing document entitled **THIRD STIPULATION AND PROPOSED ORDER EXTENDING TPP LAHRS' TIME TO FILE REPLY TO TPD COMMONWEALTH'S AND LAWYERS TITLE OF NEVADA, INC'S FIRST AMENDED ANSWER AND COUNTERCLAIM**, to be served as follows:

☒ to be electronically served through court's electronic filing system, with the date and time of the electronic service substituted for the date and place of deposit in the mail; and/or

Sean L. Anderson, Esq.
J. Tyler King
2525 Box Canyon Drive
Las Vegas, Nevada 89128
*Attorneys for Christopher Communities
at Southern Highlands Golf Club HOA*
Sanderson@lkglawfirm.com
Tking@lkglawfirm.com

Robert E. Atkinson, Esq.
Atkinson Law Associates, Ltd.
376 E. Warm Springs Road,
Suite 130
Las Vegas, Nevada 89119
Attorney for Kupperlin Law Group, LLC
Email: Robert@nv-lawfirm.com

Darren T. Brenner, Esq.
Rex Garner, Esq.
Akerman LLP
1160 Town Center Drive, Suite 330
Las Vegas, NV 89144
Attorneys for Plaintiff
Email: Darren.brenner@akerman.com
Email: Rex.garner@akerman.com

John T. Steffan, Esq.
Todd W. Prall, Esq.
Hutchison & Steffen, PLLC
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
Attorneys for Lahrs/Lahrs Family Trust
Email: Tprall@hutchlegal.com

Joseph Gutierrez, Esq.
Daniel Barraza, Esq.
Maier Gutierrez & Associates
8816 Spanish Ridge Ave.
Las Vegas, NV 89148
Attorneys for Bloom & First 100, LLC
Email: jag@mgalaw.com
Email: djb@mgalaw.com

Sophia S. Lau, Esq., NSB No. 13365
Early Sullivan Wright Gizer & McRae, LLP
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, NV 89148
Email: Slau@earllysullivan.com

Christopher I. Ritter, Esq.
Early Sullivan Wright Gizer & McRae, LLP
6420 Wilshire Blvd, 17th Floor
Los Angeles, CA 90048
Email: critter@earlySullivan.com
Attorneys for Commonwealth/Lawyers Title

/s/ Heather Stroup

For Jeffery Albregts, LLC